

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:

Bernadette Morris

Case No. 10-32031-DOT

Debtor (s)

Chapter 13

15238 Timsberry Circle

Chester, VA 23831

Last four digits of Social Security or Individual Tax-payer
Identification (ITIN) No(s)., (if any 4966)

NOTICE OF MOTION

Debtor(s), by counsel, have filed papers with the court for a Motion to Extend time to file Debtor's Certification of Compliance with 11 U.S.C. Section §1328.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion (or objection), or if you want the court to consider your views on the motion (or objection), then on or before **September 11**, you or your attorney must:

- ☒ File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Clerk of Court
United States Bankruptcy Court
701 E. Broad St.
Richmond, VA 23219

You must also mail a copy to:

America Law Group, Inc.
2312 Boulevard
Colonial Heights, VA 23834

- ☐ Attend a hearing to be scheduled at a later date. You will receive a separate notice of hearing. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.**

☐ Attend the hearing on the motion (or objection) scheduled to be held on [date & time] AM at the United States Bankruptcy Court, 701 E. Broad St, Courtroom , Richmond, VA 23219.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: September 4, 2013

/s/ Richard J. Oulton
America Law Group, Inc.
2312 Boulevard
Colonial Heights, VA 23834
Ph: 804-520-2428
VA State Bar No: 29640
Counsel for Debtor

Certificate of Service

I hereby certify that I have this September 4, 2013 mailed or sent by electronic means a true copy of the foregoing Notice of Motion (or Objection) to the parties listed on the attached service list.

/s/ Richard J. Oulton
Counsel for Debtor(s)

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:

Bernadette Morris

10-32031-DOT

Debtor(s)

Chapter 13

*****NOTICE OF TIME FOR FILING RESPONSE*****

NOTICE IS HEREBY GIVEN that pursuant to Local Bankruptcy Rule Number 1007 (c) of the Eastern District of Virginia, effective January 1, 1997, the Court may enter an Order without a hearing if no response is filed to this Motion within seven (7) business days after service by the debtor.

**MOTION FOR EXTENSION OF TIME TO FILE DEBTOR'S
CERTIFICATION OF COMPLIANCE WITH 11 U.S.C. § 1328**

Debtor(s), by counsel, move the Court and state the following:

1. A voluntary petition under the provisions of title 11 of the United States Code was filed herein on March 23, 2010.
2. At that time, the debtor(s) also filed a list of all creditors and their addresses.
3. The time to file the Debtor's Certification of Compliance with 11 U.S.C. § 1328 will expire on September 5, 2013.
4. For the following reasons the debtor(s) are unable to file the Debtor's Certification of Compliance with 11 U.S.C. § 1328 required by FRBP 1007 within the prescribed time:

Attorney has had difficulty reaching the client to ensure they have read and signed the Debtor's Certification of Compliance with 11 U.S.C. § 1328.

WHEREFORE movants pray the Court for an Order extending debtor(s) time for filing the debtor's Certification of Compliance with 11 U.S.C. § 1328 until fourteen (14) days from the date of this motion.

DATE: 9/4/2013

Respectfully submitted:
Bernadette Morris
By Counsel

/s/ Richard J. Oulton VSB #29640
Counsel for Debtor
America Law Group, Inc.
2312 Boulevard
Colonial Heights, VA 23834

804-520-2428

Certificate of Service

I certify that on September 4, 2013, a copy of this NOTICE OF MOTION and MOTION FOR EXTENSION OF TIME TO FILE DEBTOR'S CERTIFICATION OF COMPLIANCE WITH 11 U.S.C. § 1328 has been electronically mailed or sent via first-class mail, postage pre-paid, to Carl M. Bates, Chapter 13 Trustee, PO Box 1819, Richmond, VA 23218, and to The U.S. Trustee, 701 East Broad Street, Suite 4300, Richmond, VA 23219, and all other creditors and necessary parties.

/s/ Richard J. Oulton

Richard J. Oulton
Counsel for Debtor(s)
VSB #29640

List of Creditors

Arrow Financial Services

5996 W Touhy Ave
Niles, IL 60714-0000

Care Credit

Ge Money Bank
PO Box 981439
El Paso, TX 79998-0000

Central Virginia Health Serv.

Po box 220
New Canton, VA 23123-0000

Crossroads

4510 Whitehill Blvd
Prince George, VA 23875-0000

Equidata

724 Thimble Shoals Blvd
Newport News, VA 23606-0000

Fbcs

841 E Hunting Park Ave
Philadelphia, PA 19124-0000

Federal Credit Corp

Po Box 599
Colleyville, TX 76034-0000

Heilig Meyers

22 Washington Street
Petersburg, VA 23803-0000

Ista

Po Box 660610
Dallas, TX 75266-0000

Jefferson Capital Systems LLC

PO BOX 7999
SAINT CLOUD MN 56302-9617

Michael Wayne Investments

6336 East Virginia Beach Blvd
Norfolk, VA 23502-0000

Midland Funding LLC

by American InfoSource LP as agent
Attn: Department 1
PO Box 4457
Houston, TX 77210-4457

Midland Funding LLC

by American InfoSource LP as agent
Attn: Department 1
PO Box 4457
Houston, TX 77210-4457

Nco Fin /27

Po Box 7216
Philadelphia, PA 19101-0000

Palisades Collections, LLC

Vativ Recovery Solutions LLC
As Agent For Palisades Collections,
LLC

PO Box 40728
Houston, TX 77240

The Debt Law Group, Plc
PO Box 5928
Glen Allen VA 23058

Verizon
Po Box 3397
Bloomington, IL 61702-0000

Verizon
PO Box 3037
Bloomington, IL 61702-3037

Verizon Virginia Inc

500 Technology Dr
Weldon Spring, MO 63304-0000

Verizon Wireless
PO Box 3397
Bloomington, IL 61702-3397

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PO Box 3397
Bloomington, IL 61702-3397